

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WILLIAM PARKER, )  
Plaintiff, ) No. 2:23-cv-2102  
v. )  
EDWARD C. GAINY, et al., ) JURY TRIAL DEMANDED  
Defendants. )

**CERTIFICATE OF CONFERRAL**

Undersigned counsel for Defendant Kerry Ford certifies that she has made good-faith efforts to confer with Mr. Parker to determine whether the identified pleading deficiencies may be cured by amendment. All efforts to confer have been via e-mail, as Mr. Parker refuses to speak to undersigned counsel via telephone.

Undersigned counsel e-mailed Mr. Parker a letter on April 24, 2024, outlining the deficiencies in his Complaint with respect to Mayor Ed Gainey, Chief Larry Scirocco, Detective Michael Gay, and Detective Kerry Ford. On May 7, 2024, Mr. Parker indicated he intended to amend his Complaint. Undersigned counsel asked Mr. Parker when he planned to amend his Complaint, and Mr. Parker has not yet responded. To date, Mr. Parker has not amended his Complaint, necessitating the filing of this motion in order to adhere to the deadline for responding to Mr. Parker's Complaint on behalf of Detective Ford.

It should also be noted that Mr. Parker indicated as early as January 2, 2024, that he planned on amending his Complaint. *See* ECF No. 11-1. Since then, Mr. Parker has failed to amend his Complaint and has failed to respond to two motions to dismiss filed by the City of Pittsburgh and Bethany Hallam at ECF Nos. 11 and 17, respectively.

Respectfully submitted,

KRYSIA KUBIAK  
City Solicitor

/s/ Hillary M. Weaver

Hillary M. Weaver, Esquire  
Assistant City Solicitor  
PA I.D. No. 322545  
City of Pittsburgh Department of Law  
313 City-County Building  
414 Grant Street  
Pittsburgh, PA 15219  
(412) 255-2014  
[hillary.weaver@pittsburghpa.gov](mailto:hillary.weaver@pittsburghpa.gov)  
*Counsel for Detective Kerry Ford*